

Representation - Draft Modification Report UNC 0831 0831A

0831 – Allocation of LDZ UIG to Shippers Based on a Straight Throughput Method

0831A - Allocation of LDZ UIG to Shippers (Class 2, 3 and 4) Based on a Straight Throughput Method

Responses invited by: 5pm on 19 October 2023

To: enquiries@gasgovernance.co.uk

Please note submission of your representation confirms your consent for publication/circulation.

Representative:	Claire Louise Roberts
Organisation:	ScottishPower
Date of Representation:	19 October 2023
Support or oppose implementation?	0831 - Oppose 0831A -Oppose
Alternate preference:	<i>If either 0831 or 0831A were to be implemented, which would be your preference?</i> Neither
Relevant Objective:	d) Negative f) Negative
Relevant Charging Methodology Objective:	Not Applicable

Reason for opposition: Please summarise (in one paragraph) the key reason(s)

We do not support implementation of either modification, we are reluctant to deviate from the key principles of the AUGE which ensures UIG is independently determined. These modifications by removing the AUGE would also remove the opportunity for the underlying contributors to UIG to be investigated and addressed by industry.

Implementation: *What lead-time do you wish to see prior to implementation and why?*

We do not support implementation of either modification, however, should a decision be made to implement we would require a minimum of 6 months lead time. To note UIG is a line item in the Energy Price Cap and feeds into SVT's we would need to ensure there is sufficient time to deal with any unintended impacts.

Impacts and Costs: *What analysis, development and ongoing costs would you face?*

There could be additional costs, however we are unable to quantify at this time.

Legal Text: *Are you satisfied that the legal text will deliver the intent of the Solution?*

No comment

Modification Panel Members have requested that the following questions are addressed:

Q1: Do you have views on the effect of these two alternatives on end consumers?

UNC0831/A would have a potential impact on domestic customers as higher UIG costs would be incurred by them.

Q2: Is the process in electricity comparable? (please explain)

No, its not comparable as more factors influence the accuracy of gas measurement compared to electricity. Volumes of electricity are not impacted by pressure and temperature in the same way as gas.

Are there any errors or omissions in this Modification Report that you think should be taken into account? *Include details of any impacts/costs to your organisation that are directly related to this.*

No further comments

Please provide below any additional analysis or information to support your representation

No further comments